

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

LIZA ENGESSER, MARISOL GETCHIUS,
GEETANJALI SEEPERSAUD by her Next Friend
SAVITRI SEEPERSAUD, and MARIA JAIME on
her own behalf and as Next Friend to Y.P.S. AND
C.P., individually and on behalf of all persons
similarly situated, BROOKLYN CENTER FOR
INDEPENDENCE OF THE DISABLED, and
REGIONAL CENTER FOR INDEPENDENT
LIVING,

Plaintiffs,

-against-

JAMES V. MCDONALD, as Commissioner of the
New York State Department of Health,

Defendant.

Dkt. No.: 25-CV-1689

**SUPPLEMENTAL DECLARATION
OF MARIA JAIME**

Maria Jaime hereby declares, under penalty of perjury, pursuant to 28 U.S.C. 1746, that:

1. Since this case was filed, a woman at PPL name Anne Marie has been proactively calling to help me with my family's PPL transition. I am relieved to have her help. She has made this process less stressful than before, when I was navigating the system on my own.
2. Even with Anne Marie's help, however, it has been very stressful trying to keep track of the five unique log-in email addresses or phone numbers, and five unique passwords, for my family's CDPAP cases. And even with Anne Marie's help, no one in my family has finished everything required to get our CDPAP services.

3. For my daughter Y.P.S.'s CDPAP case, her three personal assistants, myself as her designated representative, and my daughter as the consumer, are now all registered.
4. However, as of this morning on April 2, the PPL Summary page for my daughter, attached as an exhibit, shows that there is no legal guardian for her account. I have tried listing myself as her legal guardian multiple times. I do not know how to fix this.
5. Also, as of this morning on April 2, the PPL Summary page for my daughter, attached as an exhibit, shows that there are 0 active authorizations in her account. In the "Service Authorizations" tab, attached as an exhibit, it shows "No Record Found." I do not know how to get the active authorization for my daughter's case.
6. I am confused about what the lack of a legal guardian and the lack of an active authorization will mean for my daughter's ability to get homecare. I am especially confused because the "To Do List" tab on her PPL page, attached as an exhibit, shows "No pending items for you." Also, the "Checklist" tab on her PPL page, attached as an exhibit, shows "1/1 Completed" for the Consumer Checklist. It seems that I have no remaining actions to take for my daughter's case.
7. For my son C.P.'s CDPAP case, myself as his legal guardian, and my son as the consumer, are registered.
8. However, my son's one personal assistant is not yet complete.
9. As of this morning on April 2, the PPL Summary page for my son, attached as an exhibit, shows that there is no designated representative for his account. I have tried listing myself as his designated representative multiple times. I do not know how to fix this.
10. The PPL Summary page for my son, attached as an exhibit, shows 1 active authorization.
11. In the "Service Authorizations" tab, attached as an exhibit, it shows an authorization.

12. I do not understand why PPL was able to receive the active authorization for my son's case, but not for my daughter's case.
13. I am confused about what the lack of a designated representative will mean for my son's ability to get homecare. I am especially confused because the "To Do List" tab on his PPL page, attached as an exhibit, shows: "No pending items for you." Also, the "Checklist" tab on his PPL page, attached as an exhibit, shows "1/1 Completed" for the Consumer Checklist. It seems that I have no remaining actions to take for my son's case.
14. For my own CDPAP case, I as the consumer am registered.
15. However, my one personal assistant is not registered. She does not speak English, is not comfortable with technology, and is still unsure how to complete registration.
16. As of this morning on April 2, no personal assistants have clocked in for my daughter's CDPAP case, my son's CDPAP case, nor my CDPAP case.
17. The three personal assistants for my daughter, the one personal assistant for my son, and the one personal assistant for myself, are unable to clock in because they do not have a smartphone and they are not technologically savvy. It is my understanding that each personal assistant must have a smart phone, must download the electronic visit verification app, and must create unique logins to clock in and out of the PPL system. This is too difficult for the personal assistants, and I do not have a landline at home.
18. I have too much on my plate with trying to complete all of the paperwork for myself and my two children. I am unable to find smartphones for each of the five personal assistants, and I am unable to train each of them on how to use the PPL app. I do not know what we will do, since our personal assistants will not work if they cannot get paid.

Dated: April 2, 2025
Bronx, New York

Signed by:


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Maria Jaime